

Richard K. Grosboll, State Bar No. 099729
Benjamin K. Lunch, State Bar No. 246015
Chloe Quail, State Bar No. 262797
NEYHART, ANDERSON, FLYNN & GROSBOLL
369 Pine Street, Suite 800
San Francisco, CA 94104-6702
TEL: (415) 677-9440
FAX: (415) 677-9445
Email: cquail@neyhartlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(San Jose Division)

INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS UNION, LOCAL
234 ELECTRICAL WORKERS HEALTH &
WELFARE TRUST FUND; LOCAL 234 OF
THE INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS, AFL-CIO;
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS UNION, LOCAL
234 EDUCATIONAL AND TRAINING
FUND; INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS DISTRICT 9 PENSION PLAN;
and KENNETH SCHERPINSKI, as Trustee
of Plaintiff Trusts and Business Manager of
Local 234,

Plaintiffs,

v.

WILLIAM CHARLES PORGES, an
individual, dba ACCELERATED
ELECTRIC,

Defendant.

Case No. 10-CV-5778 EJD

**STIPULATION AND ~~PROPOSED~~ ORDER TO CONTINUE DISCOVERY
CUT-OFF AND RELATED DATES**

NEYHART,
ANDERSON,
FLYNN &
GROSBOLL
ATTORNEYS AT LAW

Defendant William Charles Porges, dba Accelerated Electric and Plaintiffs stipulate to continue discovery deadlines 30 days while settlement discussions continue. The parties continue to exchange information in an effort to resolve the case prior to trial. The current fact discovery cut off is January 16, 2012. The new fact discovery cut off will be February 16, 2012. The current expert discovery cut off is February 6, 2012. The new expert discovery cut off will be March 6, 2012. The current deadline for filing dispositive motions is February 20, 2012. The new deadline for filing dispositive motions is March 20, 2012. This is the second extension of the discovery deadlines.

IT IS SO STIPULATED.

DATED: January 6, 2012

MARKS, FINCH, THORNTON & BAIRD,
LLP

By: /s/Chad T. Wishchuk

CHAD T. WISHCHUK

Attorneys for Defendant William Charles
Porges, dba Accelerated Electric

DATED: January 6, 2012

NEYHART, ANDERSON, FLYNN &
GROSBOLL

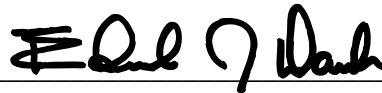
By: /s/Chloe I. Quail

CHLOE I. QUAIL

Attorneys for Plaintiffs

IT IS SO ORDERED.

DATE: January 10, 2012



U.S. District Court Judge

Edward J. Davila

NEYHART,
ANDERSON,
FLYNN &
GROSBOLL
ATTORNEYS AT LAW